

THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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May 11, 2004

SENT BY E-Mail, and  
First Class U.S. Mail

Thomas P. O'Neill, Esq.  
KeySpan Energy Delivery  
52 Second Avenue  
Waltham, MA 02451

Re: Essex Gas Company, D.T.E. 04-20

Dear Mr. O'Neill:

Enclosed is the first set of information requests by the Department of Telecommunications and Energy to Essex Gas Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., May 25, 2004.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel  
Hearing Officer

Enc.  
cc: Service List  
Mary Cottrell, Secretary

FIRST SET OF INFORMATION REQUEST OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
ESSEX GAS COMPANY

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Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Essex Gas Company ("Essex" or "Company") the following information request(s) with respect to the March 1, 2004 Service Quality ("SQ") Report, ("Filing") D.T.E. 04-20.

**INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, and three copies of the responses to Jody M. Stiefel, Hearing Officer.

### **Requests**

- DTE 1-1 Please refer to the Company's Filing at I-1. Explain why the data used to calculate "Lost Time Accident Rate" are not limited to direct Essex Gas data, but include also "allocation from Corporate Services." Recalculate the "Lost Time Accident Rate" using direct Essex Gas data only.
- DTE 1-2 Please refer to the Company's Filing at I-1. Break down the 2003 Staffing Levels data (i.e., total KeySpan Massachusetts employees) by Company (i.e., Boston Gas Company, Essex Gas Company, and Colonial Gas Company). Show the formula that KeySpan uses to allocate employees by Company for planning and budgeting purposes.
- DTE 1-3 Please refer to the Company's Filing at I-1. Explain why the data used to calculate "Restricted Work Day Rate" are not limited to direct Essex Gas data, but include also "allocation from Corporate Services." Recalculate the "Restricted Work Day Rate" using direct Essex Gas data only.
- DTE 1-4 Please refer to the Company's Filing at Section 2, Historical Performance Data.
- (a) Using a line graph or a bar chart, show the number of "Consumer Division Bill Adjustments per 1,000 Customers" for the period 1992 through 2002.
  - (b) Please explain why the figure for 2000 is significantly greater than the figures for the other years.
  - (c) Please recalculate the mean, standard deviation, benchmark, credit benchmark, penalty/credit for "Consumer Division Bill Adjustments per 1,000 Customers" if one excludes the figure for 2000 from the data.
  - (d) Please recalculate the mean, standard deviation, benchmark, credit benchmark, penalty/credit for "Consumer Division Bill Adjustments per 1,000 Customers" if one excludes the figure for 2000 from the data and replaces it with the average for the remaining years.

- DTE 1-5 Please refer to the Company's Filing at Section 2, Historical Performance Data. With regard to "Unaccounted for Gas Use" explain why the figures for 2001 and 2003 are negative.
- DTE 1-6 Please refer to the Company's Filing at Section 2, Historical Performance Data. Calculate the percentage increase in "Consumer Division Cases" from 2002 to 2003. Explain the reason for the increase in "Consumer Division Cases" between 2002 and 2003.
- DTE 1-7 Please refer to the Company's Filing at Section 2, Historical Performance Data. Calculate the percentage increase in "Consumer Division Bill Adjustments per 1,000 Customers" from 2002 to 2003. Explain the reason for the increase in "Consumer Division Bill Adjustments per 1,000 Customers" between 2002 and 2003.
- DTE 1-8 Please refer to the Company's Filing at Section 2, Historical Performance Data.
- (a) Explain why benchmarks for "Consumer Division Cases" and "Consumer Division Billing Adjustments per 1,000 Customers" were calculated using the 1992 through 2001 data, instead of 1992 through 2002.
  - (b) Calculate the Average, Standard Deviation, Benchmark, Penalty Benchmark, and Credit Benchmark for "Consumer Division Cases" and "Consumer Division Billing Adjustments per 1,000 Customers" using the 1992 through 2003 data. Based on these calculations, recalculate the Credit/Penalty amount for "Consumer Division Cases" and "Consumer Division Billing Adjustments per 1,000 Customers" for 2003.
- DTE 1-9 Please refer to the Company's Filing at Section 2, Historical Performance Data.
- (a) Calculate the percentage increase in "Capital Expenses" from 2002 to 2003.
  - (b) For each year from 1992 through 2003, calculate the share (i.e., proportion) of "Overheads and Intangibles" in "Capital Expenses."
  - (c) Explain whether any part of the "Capital Expenses" for 2000, 2001, 2002 and 2003 include "Capital Expenses" for KeySpan MA, KeySpan Energy Delivery New England, and/or KeySpan Corporate Services.
- DTE 1-10 Please refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules. Provide the raw data supporting the calculation of the "Actual Performance" for "Emergency TSF" for January through December 2003. Indicate the standards (in seconds) used to calculate the "Emergency TSF."

- DTE 1-11 Please refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules. Using a line graph or a bar chart show the "Emergency TSF" for January through December 2003 relative to the benchmark performance level and the average for the year. Explain why the "Actual Performance" figures for "Emergency TSF" for October 2003 was significantly lower than the benchmark performance level and the average figure for the year. Indicate the standards (in seconds) used to calculate the "Emergency TSF."
- DTE 1-12 Please refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules. Provide the raw data supporting the calculation of the "Actual Performance" for "Non Emergency TSF" for January through December 2003. Indicate the standards (in seconds) used to calculate the "Non Emergency TSF."
- DTE 1-13 Please refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules. Using a line graph or a bar chart show the "Non Emergency TSF" for January through December 2003 relative to the benchmark performance level and the average for the year. Explain why the "Actual Performance" figures for "Non Emergency TSF" for the months of March, June and December 2003 were significantly lower than the benchmark performance level and the average figure for the year. Indicate the standards (in seconds) used to calculate the "Non Emergency TSF."
- DTE 1-14 Please refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules.
- (a) Provide the raw data (e.g., log book, etc.) for "Service Appointments Kept" for January through December 2003.
  - (b) Explain why the "Service Appointments Met" in March, July and August 2003 were below the benchmark performance level and the average figure for the year.
- DTE 1-15 Refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules. With regard to "Actual Performance" for "Lost Time Accident", please explain whether the "dashes" represent "zeros" and/or "missing values."
- DTE 1-16 Refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules (Attachment I). With regard to "Actual Performance" for "DTE Cases", please explain whether the "dashes" represent "zeros" and/or "missing values."
- DTE 1-17 Refer to the Company's Filing, at Section 3, Back-up Data & Supporting Schedules. With regard to "DTE Bill Adj./1,000 Res. Custs.", please explain whether the "dashes" represent "zeros" and/or "missing values."

- DTE 1-18 Please refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules.
- (a) Explain the procedures that Harpers Research and Consulting used to conduct the "DTE Satisfaction Tracking Study" (i.e., "DTE - Residential Contact Tracking - 2003" Study). The response should include a description of the research design for the study (i.e., sampling frame, sample size, sampling fraction, sample selection techniques and the interviewing procedures used for the study)
  - (b) Provide a narrative summarizing the results of the "DTE Satisfaction Tracking Study" (i.e., "DTE - Residential Contact Tracking - 2003" Study.) Illustrate the results of the study using either a pie chart or a bar chart. What are the Company's conclusions from the study?
  - (c) Explain the reason(s) for the relatively high percentage (15 %) of customers who said they were "Very Dissatisfied" in May 2003 compared to the rest of the year.
- DTE 1-19 Please refer to the Company's Filing at Section 3, Back-up Data & Supporting Schedules.
- (a) Explain the procedures that Harpers Research and Consulting used to conduct the "DTE Satisfaction Tracking Study" (i.e., "DTE - Residential Non-Contact Tracking - 2003" Study). Your response should include a description of the research design for the study (i.e., sampling frame, sample size, sampling fraction, sample selection techniques and the interviewing procedures used for the study)
  - (b) Provide a narrative summarizing the results of the "DTE Satisfaction Tracking Study" (i.e., "DTE - Residential Non-Contact Tracking - 2003" Study.) Illustrate the results of the study using either a pie chart or a bar chart. What are the Company's conclusions from the study?
  - (c) Explain the reason(s) for the relatively high percentage (11 %) of customers in the "Bottom 3 box" in June 2003 compared to the rest of the year.
- DTE 1-20 Please explain how the Company calculates the number of responses to Odor Calls. Specifically, if the Company receives more than one call regarding the same odor source, does the Company count this as one call or as multiple calls?